

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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| In the Matter of |) | |
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| Inquiry Concerning 911 Access, Routing, and |) | PS Docket No. 17-239 |
| Location in Enterprise Communications Systems |) | |
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**COMMENTS OF
THE AMERICAN HOTEL & LODGING ASSOCIATION**

The American Hotel & Lodging Association (“AHLA”) submits these comments in response to the Commission’s *Notice of Inquiry* regarding 911 services in enterprise communications systems.¹ AHLA is the sole national association representing all sectors and stakeholders in the U.S. lodging industry, including owners, real estate investment trusts, chains, franchisees, management companies, independent properties, bed-and-breakfasts, suppliers, and state hotel associations.²

Nearly three years ago, Chairman Pai saw a problem and took action to fix it, pledging that he would do his best to ensure that a tragedy such as Kari Rene Hunt Dunn’s murder – and its effect on her family – would not recur. AHLA applauds Chairman Pai’s consistent leadership

¹ *Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems*, PS Docket No. 17-239, FCC 17-125, Notice of Inquiry (PSHSB 2017) (“*NOI*”).

² AHLA represents more than 54,000 properties nationwide, which translates into eight million American jobs, more than one trillion in U.S. sales (one of the 10 largest business sectors in America), and service to five million guests each day. Hotels are at the center of communities across the country, creating long-term careers and opportunities for upward mobility, spurring economic growth, investing in communities, and serving America’s travelers. More than 60 percent of hotels are small businesses. AHLA advocates for its members so they can do their best at what matters most: serving guests, employees, and their communities.

on this important issue and is proud to have been recognized by him as “a leader in changing industry practice” to ensure systems are in place for direct dial 911 from all hotel guestrooms.³

The Commission need not take any regulatory action to address 911 dialing from hotel guestrooms, particularly in light of the anticipated passage of Kari’s Law. AHLA welcomes the opportunity for open dialogue with the Commission and would be pleased to work together on efforts to continue to educate the hotel industry and hotel guests.

I. HOTELIERS HAVE PRIORITIZED UPGRADING AND EVEN REPLACING ENTIRE SYSTEMS TO ENSURE GUESTS CAN COMMUNICATE DURING EMERGENCIES

Since 2014, AHLA has worked aggressively with members to ensure systems are in place for direct dial 911 from all guestrooms. As an initial step, AHLA encouraged all lodging properties to review their telephone systems to ensure that when 911 is directly dialed from a guestroom phone, without using an access code, the guest is connected to emergency services and/or a hotel employee. After such reviews, some members determined that they needed to take action in order to effectuate direct dial 911. The nine largest AHLA member chains have achieved virtually complete implementation of direct dial 911 at all of their owned and managed properties.

Ownership structures in the hotel industry are complex, and chains must work indirectly to ensure that properties not owned and managed by them include the same level of consumer protections. AHLA member chains have encouraged their franchisees to follow the same steps as the brands and ensure that, when a guest dials 911 from a guestroom phone, without using an

³ Testimony of FCC Commissioner Ajit Pai Before the U.S. Senate Committee on Commerce, Science, and Transportation, “Oversight of the Federal Communications Commission,” Mar. 2, 2016 at 1.

access code, he or she is connected to emergency services and/or a hotel employee. All of the nine largest member chains (representing almost 40 percent of U.S. properties) have undergone the rigorous process of updating their brand standards to require direct dial 911 at franchised properties, or taken other extensive measures in pursuit of full implementation of direct dial 911 at franchised properties.

The hospitality industry has always put guests first, and hoteliers take their guests' safety extremely seriously.⁴ Below are some examples of how the major hotel chains have addressed 911 concerns:

- **Best Western.** Best Western does not have any owned or managed properties, but has educated its branded hotels on the topic of direct dial 911 at regional meetings in 2015 and 2016, attended by more than 2,000 hotel operators, and at its 2015 annual convention, attended by representatives of 1,500 Best Western branded North American hotels. Best Western also invited telephone system manufacturers to attend the 2015 annual convention in order to facilitate hotels' ability to determine whether to convert existing telephone systems or purchase new systems with direct dial 911 features. In addition to continuing to discuss this important issue with its member hotels, Best Western amended its brand requirements so that prior to opening, all new Best Western branded hotels must have a hotel telephone system that provides direct dial 911 from all guestrooms.
- **Carlson Rezidor (Radisson parent company).** All of the company's owned and/or managed hotels have implemented direct dial 911 from guestrooms, and the company has updated its brand standard to require that direct dial 911 be in place at all franchised select and full service properties.
- **Hilton Worldwide.** Between 2015 and 2016, Hilton went from a 50 percent owned and managed direct dial 911 implementation rate to 99 percent. The Hilton brand standards require franchisees to reprogram/upgrade their systems to ensure that guests can dial 911 directly from all guestrooms.
- **Hyatt Hotels.** All Hyatt managed properties in the U.S. have 911 pass-through technology. Hyatt updated its brand standards to require franchise properties to use this technology and has provided guidance to franchised locations to work through their IT vendors to achieve 911 direct dial.

⁴ See, e.g., Sarah Hoye, *How a Failed 911 Call Changed Texas Law*, Al Jazeera America (2015), <http://america.aljazeera.com/watch/shows/america-tonight/america-tonight-blog/2014/1/14/after-hotel-murderkarislawpushesforeasier911access.html>.

- **InterContinental Hotels Group (“IHG”).** IHG managed properties achieved 100 percent direct dial implementation in 2015, and IHG has taken extensive measures toward achieving full implementation at franchised properties.
- **La Quinta Inns & Suites.** 100 percent of La Quinta’s managed properties have direct dial 911 in place, and direct dial 911 is part of the La Quinta brand standards.
- **Marriott Hotels.** Marriott owned and managed hotels have 100 percent direct dial 911 implementation, and Marriott has taken extensive measures toward achieving full implementation at franchised properties.
- **G6 Hospitality (Motel 6/Studio6).** All corporate owned/operated hotels provide direct dial 911, and direct dial 911 is part of the brand standard.
- **Wyndham Hotel Group.** 100 percent of Wyndham’s owned and managed properties have implemented direct dial 911. Wyndham’s brand requirements obligate any new franchised hotels to have direct dial 911 before they open, and Wyndham has taken actions to encourage existing franchisees to review their systems and make any changes necessary to implement direct dial 911.

AHLA also has worked to educate *all* properties, including independent properties, on the need to make the switch to direct dial 911 as soon as possible and ways to implement the change. For example, AHLA led an industry-wide webinar attended by hundreds of hoteliers to share valuable and concrete information for properties working to implement direct dial 911 from their guestrooms.

II. CONGRESS IS ADDRESSING DIRECT DIAL 911 THROUGH KARI’S LAW

AHLA strongly supports adoption of Kari’s Law, which would require any multi-line telephone system to have a default configuration that allows for direct dial to 911 without dialing additional digits.⁵ The legislation provides a common sense solution to an important problem without placing a challenging legal compliance burdens on small businesses and property

⁵ S. 123, Kari’s Law Act of 2017 (115th Cong., 2017); H.R. 582, Kari’s Law Act of 2017 (115th Cong., 2017); *see also* NOI ¶ 16.

owners. Kari's Law will assist hoteliers to implement direct dial 911 by ensuring that manufacturers provide phones configured for direct dial. As the *NOI* notes, both chambers of Congress have approved a version of Kari's Law on a bipartisan basis, and AHLA urges the House and Senate to move forward as soon as possible on a reconciled bill that can become law. The Commission need not separately address hotels' provision of 911 services, nor does the Commission have authority to do so.

III. CONCLUSION

The *NOI* asks important questions about an issue Chairman Pai consistently has championed. The need to reach 911 and summon emergency services quickly in critical situations is not limited to hotels, and AHLA cannot speak to developments in office buildings, on campuses, and in other facilities with enterprise communications systems. The hotel industry has aggressively addressed concerns raised by the Commission and other policymakers with respect to 911 calls from hotel guestrooms. AHLA welcomes further dialogue with the Commission and supports enactment of Kari's Law. No additional regulatory action is necessary to protect hotel guests.

Respectfully submitted,

AMERICAN HOTEL & LODGING
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